

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

BRENNAN CENTER FOR JUSTICE
AT NEW YORK UNIVERSITY
SCHOOL OF LAW,

Plaintiff,

vs.

UNITED STATES DEPARTMENT OF
STATE,

Defendant.

Case No. 17 Civ. 7520 (PGG)

**NOTICE OF MOTION
TO EXPEDITE FREEDOM OF INFORMATION ACT (“FOIA”) ACTION**

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. § 1657 and upon the attached memorandum of law and accompanying Declaration of Jaclyn E. Martínez Resly, both dated November 30, 2017, Plaintiff Brennan Center for Justice at New York University School of Law respectfully moves this Court, before the Honorable Paul G. Gardephe, United States District Judge, at the Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 705, New York, New York, as soon as counsel may be heard, for an order expediting this Freedom of Information Act (“FOIA”) action.

Specifically, for the reasons set forth in the accompanying papers, Plaintiff seeks an order setting a near-term production deadline of non-exempt, and reasonably segregable non-exempt portions, of records at issue in this litigation along with corresponding justifications for withheld records and withheld portions of such records.

Dated: New York, New York
November 30, 2017

Respectfully submitted,

s/ Neil K. Roman

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ⁱⁱ *Admission pending*


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Attorneys for Plaintiff Brennan Center for Justice at New York University School of Law

CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2017, in accordance with Judge Gardephe's individual rules of practice for civil cases, I served the foregoing document and its attachments on the following counsel by email and overnight Federal Express:

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By: 
Jaclyn E. Martínez Resly